



"Where the Customer Owns the Company"

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December 20, 2004

Jeffrey Carlisle, Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12th St., SW  
Washington, DC 20554

Re: Partner Communications Cooperative and Iowa  
Telecommunications Services Inc a/b/a Iowa Telecom.  
Joint Petition for Waiver of Definition of Study Area of the  
Appendix-Glossary of Part 36 of the Commission Rules.  
CC Docket No. 96-45

Dear Mr. Carlisle:

Partner Communications Cooperative has an agreement to purchase four exchanges, Baxter, Melbourne, Rhodes and Sate Center, Iowa, from Iowa Telecom. Our Joint Petition for the necessary waivers to complete this transaction has been pending at the Bureau since June 14, 2004. Despite the lack of action on the joint waiver petition, on October 1, 2004 the bureau approved the separate transfer of control application, finding that the transfer would "serve the public interest, convenience and necessity." The Iowa Utilities Board similarly found on June 23, 2004, that Partner has demonstrated "a history of providing local exchange telecommunications service in compliance with the Board's rules and that it is ready, willing, and able to provide comparable service in the [exchanges]."

The trade press reports regularly that the President and the Commission have determined that the national interest will be served by rapid deployment of broadband services to all Americans. Nevertheless our plans to bring such service to the four exchanges are on indefinite hold while we await the Bureau's action on Petition.

If the waivers are granted, we plan to install OCCAM 6013 Broadband Loop carrier system and fiber terminal equipment between the current State Center switching office and our Gilman, Iowa, switch. We will upgrade the State Center, Iowa, host switch to a MetaSwitch 3510 next generation softswitch to serve these four exchanges and 2,030 customers. This switch will support LNP, CALEA, VOIP services as well as provide DSL2Plus service, the latest generation of DSL broadband technology. We estimate that this new DSL service will be available to half of the 2,030 access lines affected by this transaction. In order to deploy these new services in a timely fashion, we completed 13 miles of fiber construction late this fall, before the winter freeze hit central Iowa.

As an agricultural community, we are well aware of the competition in a world economy and the need to deploy the highest quality telecommunications services possible to our members. Each day that we delay getting these services deployed may be an opportunity lost to a small business or farmer in our area. Each day of delay also means potentially higher interest costs to the Cooperative.

We have not been given any reason for the delay in acting on our Petition, but are prepared to respond to any questions. Please call my office at 641-498-7701 if you have any questions. With your help and continued support we can accomplish our goal of deploying broadband services to our entire exchange territory.

Sincerely,



Donald S Jennings  
EVP/GM